IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS MARSHALL DIVISION

LIONRA TECHNOLOGIES LIMITED

v.

CASE NO. 2:22-cv-00322-JRG-RSP (Lead Case)

FORTINET, INC.

LIONRA TECHNOLOGIES LIMITED

v.

CISCO SYSTEMS, INC.

LIONRA TECHNOLOGIES LIMITED

v.

HEWLETT PACKARD ENTERPRISE COMPANY, et al.

LIONRA TECHNOLOGIES LIMITED

v.

PALO ALTO NETWORKS, INC.

CASE NO. 2:22-cv-00305-JRG-RSP (Member Case)

CASE NO. 2:22-cv-00319-JRG-RSP (Member Case)

CASE NO. 2:22-cv-00334-JRG-RSP (Member Case)

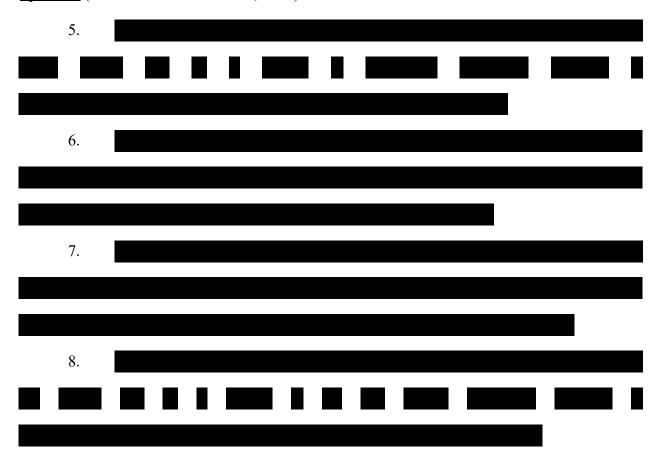
<u>DECLARATION OF ASHBEY N. MORGAN IN SUPPORT OF DEFENDANTS'</u> <u>MOTION TO TRANSFER PURSUANT TO 28 U.S.C. § 1404</u>

I, Ashbey N. Morgan declare under penalty of perjury that the following is true and correct:

- 1. I am an attorney at Gibson, Dunn & Crutcher, counsel for Defendants' Hewlett Packard Enterprise Co. and Aruba Networks, LLC (together, "Defendants"). I have personal knowledge of the facts set forth in this declaration and if called as a witness, could testify competently to such facts under oath. I am licensed to practice in the state of Texas.
- 2. Attached as Exhibit 1 is a true and correct copy of portions of Lionra Technologies Limited's ("Lionra") Disclosure of Asserted Claims and Infringement Contentions, served by

Lionra on Defendants on November 3, 2022, annotated with highlighting to indicate relevant material.

- 3. Attached as Exhibit 2 is the Assignment abstract of title for U.S. Appl. No. 11/662,978, which led to U.S. Patent No. 7,916,630, available at https://assignment.uspto.gov/patent/index.ht ml#/patent/search/resultAbstract?id=7916630&type=patNum (last accessed December 2, 2022).
- 4. Attached as Exhibit 3 is the Assignment abstract of title for U.S. Appl. No. 11/600,934, which led to U.S. Patent No. 7,921,323, available at https://assignment.uspto.gov/patent/index.html#/patent/search/resultAbstract?id=7916630&type = patNum (last accessed December 2, 2022).



9. Attached as Exhibit 8 is a true and correct screenshot of a Google Maps webpage showing driving directions and travel time for traveling from the Roseville facility at 8000

Foothills Boulevard, Roseville, California, to the U.S. Courthouse located at 501 I Street, Sacramento, California.

- 10. Attached as Exhibit 9 is a true and correct screenshot of a Google Maps webpage showing the distance between San Jose and Sacramento.
- 11. Attached as Exhibit 10 is a true and correct screenshot of a Google Maps webpage showing the distance between San Francisco and Sacramento.
- 12. Exhibit 1 to the Declaration of Chris Smith is a true and correct copy of a spreadsheet containing data about Aruba's employees in North America. The size and nature of the spreadsheet makes attaching it as an exhibit in a usable format via this Court's CM/ECF system impractical because the spreadsheet contains several columns and rows of data that are not viewable when in a printable format. As such, Defendants have provided this exhibit in native format on a flash drive to this Court.
- 13. Exhibit 1 to the Declaration of Scott Koster is a true and correct copy of a spreadsheet containing data about HPE employees in Intelligent Edge. The size and nature of the spreadsheet makes attaching it as an exhibit in a usable format via this Court's CM/ECF system impractical because the spreadsheet contains several columns and rows of data that are not viewable when in a printable format. As such, Defendants have provided this exhibit in native format on a flash drive to this Court.

I declare under penalty of perjury that the foregoing is true and correct. Executed on December 2, 2022 in Dallas, Texas.

Ashbey N. Morgan